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MEMO ENDORSED

Rachel Perillo

January 29, 2025

By ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Cesari, et al,
Including MIGUEL CINTRON
24 Cr. 154 (ER)

The application to expand Cintron's travel restrictions to include travel to Connecticut and New Jersey for employment purposes is granted.
SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 1/29/2025

New York, New York

Dear Judge Ramos:

I am the attorney for Miguel Cintron, a defendant in the above-named matter. Mr. Cintron is on pretrial release with conditions that include travel restricted to the Southern and Eastern Districts of New York. This letter is respectfully submitted without objection from Pretrial Services Officer Evelyn Alvayero to request a bond modification that would permit extended travel to Connecticut and New Jersey for employment purposes. The government, by AUSA Joseph Rosenberg, defers to the position of Pretrial Services.

The reason for this request is that Mr. Cintron recently obtained his Commercial Driver's License and is working as a truck driver for his father's trucking company. His assigned truck route requires him to pick up in Canaan, CT and deliver to Port Reading, NJ. The job would also sometimes require him to stay overnight on his truck. Pretrial Services has been provided with the specific employer information and the trucking route. Accordingly, it is respectfully requested that Mr. Cintron's travel restrictions be expanded to include travel to Connecticut and New Jersey for employment purposes. If the Court has any questions regarding this application, please do not hesitate to contact me.

Respectfully submitted,

/s/

Jeremy Schneider

cc: AUSA Joseph R. Rosenberg & AUSA Adam Margulies (by ECF)
USPTO Evelyn Alvayero (by Email)